

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

(1) [REDACTED], and  
(2) AIZAVIER ROACHE,

Defendants

) Criminal No. 24cr10001  
)

) Violations:  
)

) Count One: Conspiracy to Traffic in Firearms  
) (18 U.S.C. §§ 933(a)(1) and (3))  
)

) Firearms Forfeiture Allegation:  
) (18 U.S.C. §§ 924(d)(1) and 934(a), and 28  
) U.S.C. § 2461(c)  
)  
)  
)  
)

INDICTMENT

COUNT ONE

Conspiracy to Traffic in Firearms  
(18 U.S.C. §§ 933(a)(1), and (3))

The Grand Jury charges:

Beginning on or about January 19, 2023, and continuing through on or about August 30, 2023, in the District of Massachusetts, in the [REDACTED] and elsewhere, the defendants,

(1) [REDACTED] and  
(2) AIZAVIER ROACHE,

did knowingly conspire and agree with each other and with persons known and unknown to the Grand Jury, to ship, transport, transfer, cause to be transported, and otherwise dispose of one and more firearms, including but not limited to the following:

1. Glock 21, .45 caliber pistol, bearing serial number AHFP598;
2. Glock 22, .40 caliber pistol, bearing serial number BVKY769;
3. Taurus G2C, 9mm pistol, bearing serial number AEC170962;

4. Taurus G2C, 9mm pistol, bearing serial number AEC174225;
5. Taurus G2C, 9mm pistol, bearing serial number AEC174567; and
6. Taurus G2C, 9mm pistol, bearing serial number AEC174190,

to another person, in and otherwise affecting interstate and foreign commerce, knowing and having reasonable cause to believe that the use, carrying, and possession of a firearm by the recipient would constitute a felony (as defined in section 932(a)).

All in violation of Title 18, United States Code, Sections 933(a)(1), (a)(3), and (b).

FIREARMS FORFEITURE ALLEGATION

(18 U.S.C. §§ 924(d)(1), 934(a), and 28 U.S.C. § 2461(c))

1. Upon conviction of the offense in violation of Title 18, United States Code, Section 933, set forth in Count One the defendants,

- (1) [REDACTED] and
- (2) AIZAVIER ROACHE,

shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d)(1), and Title 28, United States Code, Section 2461(c), any firearm or ammunition involved in or used in any knowing commission of the offense, and, pursuant to Title 18, United States Code, Section 934(a), and Title 28, United States Code, Section 2461(c), any property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of such offense and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such offense.

2. If any of the property described in Paragraph 1, above, as being forfeitable pursuant to Title 18, United States Code, Sections 924(d)(1) and 934(a), and Title 28, United States Code, Section 2461(c), as a result of any act or omission of the defendants --

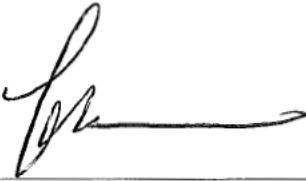
- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

it is the intention of the United States, pursuant to Title 28, United States Code, Section 2461(c), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendants up to the value of the property described in Paragraph 1 above.

All pursuant to Title 18, United States Code, Sections 924 and 934, and Title 28, United States Code, Section 2461.

A TRUE BILL

Karlos Pentedemos  
FOREPERSON



LUKE A. GOLDWORM  
ASSISTANT UNITED STATES ATTORNEY  
DISTRICT OF MASSACHUSETTS

District of Massachusetts: JANUARY 4, 2024  
Returned into the District Court by the Grand Jurors and filed.

/s/Douglas Warnock  
DEPUTY CLERK 2:37 PM